

ORIGINAL

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION

Plaintiff

v.

GALLEON MANAGEMENT, LP,  
RAJ RAJARATNAM,  
RAJIV GOEL,  
ANIL KUMAR,  
DANIELLE CHIESI,  
MARK KURLAND,  
ROBERT MOFFAT, and  
NEW CASTLE FUNDS LLC,

Defendants.

No. 09-cv-8811 (JSR)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

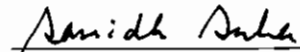
PURSUANT TO RULE 1.3(c) of the United States District Courts for the Southern and  
Eastern Districts of New York, I, Samidh Guha, a member in good standing of the bar of this  
Court, hereby moves for an Order allowing the admission *pro hac vice* of:

Applicant Name: William E. White  
Firm Name: Akin, Gump, Strauss, Hauer & Feld LLP  
Firm Address: 1333 New Hampshire Avenue NW  
Washington, DC 20036  
Phone Number: (202) 877-4000  
Fax Number: (202) 877-4288

There are no pending disciplinary proceedings against Mr. White in any State or Federal Court.

Dated: November 2, 2009  
New York, New York

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Samidh Guha", is positioned above a horizontal line.

Samidh Guha (SG-5759)

Akin Gump Strauss Hauer & Feld LLP

One Bryant Park

New York, NY 10036

(212) 872-1000

[sguha@akingump.com](mailto:sguha@akingump.com)

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

---

SECURITIES AND EXCHANGE  
COMMISSION

Plaintiff

v.

GALLEON MANAGEMENT, LP,  
RAJ RAJARATNAM,  
RAJIV GOEL,  
ANIL KUMAR,  
DANIELLE CHIESI,  
MARK KURLAND,  
ROBERT MOFFAT, and  
NEW CASTLE FUNDS LLC,

Defendants.

---

No. 09-cv-8811 (JSR)

**AFFIDAVIT OF SAMIDH GUHA  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL *PRO HAC VICE***

State of New York     )  
                                  )  
County of New York    )

ss:

SAMIDH GUHA, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Akin, Gump, Strauss, Hauer & Feld LLP, counsel for Defendant Raj Rajaratnam in the above captioned matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant Rajaratnam's motion to admit William E. White as counsel *pro hac vice* to represent Mr. Rajaratnam in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in January 1999, State Bar No. 2962199. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Mr. White since 2004.

4. Mr. White is a partner at Akin, Gump, Strauss, Hauer & Feld, LLP in Washington, District of Columbia.

5. I have found Mr. White to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Mr. White, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of William E. White, *pro hac vice*, which is attached hereto.

WHEREFORE it is respectfully requested that the motion to admit William E. White, *pro hac vice*, to represent Defendant Raj Rajaratnam in the above captioned matter, be granted

Dated: November 2, 2009  
New York, New York

Notarized:

Respectfully Submitted,

JAIME M. SHELDON  
Notary Public, State of New York  
No. 01SH6140377  
Qualified in QUEENS County  
Commission Expires JANUARY 30, 2010 *LD*

*Samidh Guha*  
Samidh Guha (SG-5759)



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202/879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

WILLIAM E. WHITE, III

---

was on the 4<sup>TH</sup> day of AUGUST, 2000

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on October 26, 2009.

GARLAND PINKSTON, JR., CLERK

By: M. Charles  
Deputy Clerk



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

October 27, 2009

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, WILLIAM EMMETT WHITE, III, #155617 was admitted to the practice of law in this state by the Supreme Court of California on December 16, 1991; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Sima La Fontaine".

Sima La Fontaine  
Custodian of Membership Records

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

---

SECURITIES AND EXCHANGE	)	
COMMISSION	)	
	)	
Plaintiff	)	
	)	
v.	)	
	)	No. 09-cv-8811 (JSR)
GALLEON MANAGEMENT, LP,	)	
RAJ RAJARATNAM,	)	
RAJIV GOEL,	)	<b>PROPOSED ORDER</b>
ANIL KUMAR,	)	
DANIELLE CHIESI,	)	
MARK KURLAND,	)	
ROBERT MOFFAT, and	)	
NEW CASTLE FUNDS LLC,	)	
	)	
Defendants.	)	

---

**UPON THE MOTION** of Samidh Guha, attorney for Defendant Raj Rajaratnam, and  
said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant Name:	William E. White
Firm Name:	Akin, Gump, Strauss, Hauer & Feld LLP
Firm Address:	1333 New Hampshire Avenue NW
	Washington, DC 20036
Phone Number:	(202) 877-4000
Fax Number:	(202) 877-4288
E-mail Address:	<a href="mailto:wwhite@akingump.com">wwhite@akingump.com</a>

is admitted to practice *pro hac vice* as counsel for Defendant Raj Rajaratnam in the above  
captioned case in the United States District Court for the Southern District of New York. All  
attorneys appearing before this Court are subject to the Local Rules of this Court, including the  
Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing  
(ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).  
Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: November \_\_\_, 2009  
New York, New York

---

The Honorable Jed S. Rakoff  
United States District Judge



**CERTIFICATE OF SERVICE**

I, Samidh Guha, hereby certify that on November 2, 2009, I served a true and correct copy of the foregoing *Pro Hac Vice* Motion and accompanying materials for Attorney William E. White upon all counsel of record registered to receive notice. Service was accomplished by regular mail to the following recipients:

Israel E. Friedman  
U.S. Securities and Exchange Commission  
Three World Financial Center  
New York, NY 10281

Jason Evan Friedman  
U.S. Securities and Exchange Commission  
Three World Financial Center  
New York, NY 10281

Valerie Ann Szczepanik  
U.S. Securities and Exchange Commission  
Three World Financial Center  
New York, NY 10281

Sanjay Wadhwa  
U.S. Securities and Exchange Commission  
Three World Financial Center  
New York, NY 10281

David Rosenfeld  
Securities and Exchange Commission  
Northeast Regional Office  
3 World Financial Center, Suite 400  
New York, NY 10281

By: Samidh Guha  
Samidh Guha (SG-5759)  
Akin Gump Strauss Hauer & Feld LLP  
One Bryant Park  
New York, NY 10036  
(212) 872-1000  
[sguha@akingump.com](mailto:sguha@akingump.com)

Dated: November 2, 2009